



OIG Office of Inspector General

U.S. Department of State • Broadcasting Board of Governors

SENSITIVE BUT UNCLASSIFIED

May 19, 2015

The Honorable Jeff Shell
Broadcasting Board of Governors
Chairman
330 Independence Ave, SW, Room 3360
Washington, DC 20237

Mr. Andre Mendes
Broadcasting Board of Governors
Interim Chief Executive Officer and Director
330 Independence Ave, SW, Room 3360
Washington, DC 20237

Dear Mr. Shell and Mr. Mendes:

Enclosed for your action is a copy of the report *Management Alert: Broadcasting Board of Governors Significant Management Weaknesses* (MA-15-01). As the action office for the report's two recommendations, which are both resolved, please provide information on actions taken or planned for the recommendations within 30 days of the date of this letter.

The Office of Inspector General (OIG) incorporated your comments as appropriate within the body of the report and included your formal response in Appendix C.

OIG appreciates the cooperation and assistance provided by your staff. If you have any questions, please contact me or Jennifer Costello, Assistant Inspector General for Evaluations and Special Projects, at [REDACTED]@state.gov.

Sincerely,

Steve A. Linick
Inspector General

Enclosures: As stated.

cc: D(MR) – Heather A. Higginbottom
R – Richard Stengel



OIG

Office of Inspector General

U.S. Department of State • Broadcasting Board of Governors

MA-15-01

Office of Evaluations and Special Projects

May 2015

Management Alert: Broadcasting Board of Governors Significant Management Weaknesses

MANAGEMENT ALERT

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Summary of Review

Through various audits, inspections, and evaluations, the Office of Inspector General (OIG) has identified significant vulnerabilities in the management and oversight of the Broadcasting Board of Governors (BBG) and its grantee organizations. Systemic, recurring problems include ineffective leadership, insufficient oversight of contracts and grants, weaknesses in financial management, and inadequate information security. Although BBG has made progress in correcting some of these vulnerabilities, significant issues remain that expose BBG to increased risk for instances of fraud, waste, and abuse.

BACKGROUND

In audits and inspections conducted over the past 3 fiscal years, the Office of Inspector General (OIG) has identified significant vulnerabilities in the management and oversight of the Broadcasting Board of Governors (BBG) and its grantee organizations. These vulnerabilities expose BBG to an increased risk of fraud, waste, and abuse and the unintended disclosure of sensitive information. Although BBG has taken steps to mitigate many of these issues through implementation of OIG recommendations, OIG remains concerned about recurring, systemic weaknesses.

Specific areas of concern include ineffective leadership, insufficient oversight of contracts and grants, weaknesses in financial management, and inadequate information security. These challenges mirror those set forth in the statement prepared by OIG for BBG's *FY 2014 Performance and Accountability Report*.¹ The Senate Appropriations Committee also expressed concern with OIG's findings in the areas of financial and contract management. The Committee directed that the BBG Chairman coordinate with OIG to submit a report to the appropriate Congressional Committees detailing the status of the implementation of OIG's recommendations, to develop an action plan with measurable goals and milestones, and to develop and implement enforcement mechanisms to assist in ensuring enhanced accountability for compliance with procurement regulations.² In response, BBG provided OIG with a report and action plan documenting its progress in improving administration and oversight of acquisition and procurement functions. The action plan resolves one of OIG's recommendations in its audit of BBG's acquisition function³ and serves as a focal point for its Board's oversight of the implementation of contracting reforms.

¹ BBG, *FY 2014 Performance and Accountability Report*, <http://www.bbg.gov/wp-content/media/2014/12/FY-2014-BBG-PAR_AccessibleVersion.pdf>.

² S. Rep. No. 113-195, at 8 (2014).

³ *Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions* (AUD-CG-IB-14-26, June 2014).

RESULTS

Ineffective Leadership

According to the U.S. Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*, "tone at the top" is a key attribute in an agency's internal control environment. Specifically, the oversight body and management should lead by examples that demonstrate the organization's values, philosophy, and operating style.⁴ Tone at the top can be either a driver or a barrier to internal control. Without a strong tone at the top to support an internal control system, the entity's risk identification may be incomplete, risk responses may be inappropriate, control activities may not be appropriately designed or implemented, communication may falter, and results of monitoring may not be understood or acted upon to remediate deficiencies.

- OIG's 2013 inspection of BBG⁵ drew attention to the effects of a weak tone at the top. OIG found that BBG's part-time Board could not provide effective oversight to all broadcasting operations and that the Board's bylaws and self-adopted governance policies were inadequate to govern appropriately the conduct of Board business. OIG also found that chronic vacancies and absences of Board members threatened the quorum required for the Board to act, limited the diversity of perspectives brought to discussion, and put at risk the bipartisan nature of the Board. To address these issues, OIG recommended that BBG create a Chief Executive Officer (CEO) position. BBG concurred with this recommendation and worked with the Administration to seek legislation to establish a new CEO position with appropriate authority. While this legislation is still pending in Congress, BBG worked with the Office of Personnel Management and the Administration to appoint a CEO under existing legislative authority. A new CEO was sworn in on January 20, 2015, but unfortunately, he has already left BBG. BBG is actively seeking his replacement, but in the interim, has appointed an interim CEO who is fully empowered to act as chief executive. In addition, OIG notes that all of its recommendations resulting from this 2013 inspection have been closed.
- Various inspections of the operations of individual BBG broadcasting offices also revealed leadership problems. For example, in its inspection of the Office of Cuba Broadcasting (OCB),⁶ OIG found that employee morale was a concern. Staff expressed that management did not communicate effectively and that decision-making processes lacked transparency. Many employees expressed fear of reprisal by management if they raised concerns. In its *Inspection of U.S. International Broadcasting to Russia*,⁷ OIG found that the Voice of America's Eurasia division director did not foster conditions for open

⁴ GAO, *Standards for Internal Control in the Federal Government* (Sept. 2014).

⁵ *Inspection of the Broadcasting Board of Governors* (ISP-IB-13-07, Jan. 2013).

⁶ *Inspection of the Office of Cuba Broadcasting* (ISP-IB-14-15, July 2014).

⁷ *Inspection of U.S. International Broadcasting to Russia* (ISP-IB-13-50, Sept. 2013).

communication in the Russian Service and recommended that BBG implement a 360 leadership assessment tool for the division director, which has been completed.

Insufficient Oversight of Grants and Contracts

OIG has reported in a number of audits and inspections that BBG does not have sufficient oversight of the three grantees it funds through annual agreements: Radio Free Europe/Radio Liberty (RFE/RL), Radio Free Asia (RFA), and Middle East Broadcasting Networks (MBN). The three grantees annually receive approximately \$245 million, one-third of BBG's total funding.⁸ Grants present special oversight challenges because, unlike contracts, grants do not generally require the recipient to deliver any specific goods or services to the Government. Examples of insufficient oversight include the following:

- An audit of RFE/RL after employment benefits⁹ found that BBG did not sufficiently monitor the grantee, did not adequately define grantee oversight roles and responsibilities, and did not maintain adequate internal communications pertaining to grantee oversight.
- During the audit of BBG's FY 2013 financial statements, an independent auditor identified a material weakness related to grants management. The auditor reported that BBG did not have procedures in place for post-award grantee monitoring to ensure that Federal awards were used only for allowable costs and did not have sufficient oversight policies and procedures to ensure that grantees have mandated procurement procedures.¹⁰ Further, BBG did not correctly record significant cash balances provided to grantees in its annual financial statements.¹¹ In its audit of BBG's FY 2014 financial statements,¹² the independent auditor noted that while BBG was assessing potential corrective actions that would bring its grantee monitoring into compliance with Federal regulations, these actions had not been executed. For example, BBG had not improved its grantee handbook to define roles and responsibilities for responsible officials. BBG had also not developed tools, templates, or best practices to ensure procedures were being appropriately executed. Further, BBG had not developed a process to ensure oversight activities were communicated between different officials involved in the oversight process. BBG officials stated that limited resources and competing priorities impacted their ability to implement planned corrective actions. BBG officials stated that they anticipated that BBG would be able to implement grantee monitoring procedures during FY 2015 and that they were recruiting a grants manager to focus on this function.

⁸ *Independent Auditor's Report on the Broadcasting Board of Governors 2014 and 2013 Financial Statements* (AUD-FM-IB-15-10, Nov. 2014).

⁹ *Audit of Radio Free Europe/Radio Liberty After-employment Benefits* (AUD-FM-IB-14-34, Sept. 2014).

¹⁰ *Independent Auditor's Report on the Broadcasting Board of Governors 2013 and 2012 Financial Statements* (AUD-FM-IB-14-14, Dec. 2013).

¹¹ *Ibid.*

¹² *Independent Auditor's Report on the Broadcasting Board of Governors 2014 and 2013 Financial Statements* (AUD-FM-IB-15-10, Nov. 2014).

With regard to contracting, the estimated total dollar amount of BBG acquisitions during FYs 2011–2013 was just over \$400 million.¹³ OIG has reported a similar lack of oversight in this area, and has also cited numerous instances of noncompliance with Federal contracting regulations:

- Based on an audit of 34 contracts, totaling almost \$7.8 million, OIG identified noncompliance with Federal contracting regulations, a lack of contract oversight, and potential violations of the Anti-Deficiency Act (ADA).¹⁴ BBG had routinely entered into Personal Services Contracts that exceeded its statutory authority. The OIG identified a reportable violation of the ADA, which prohibits “employ[ing] personal services exceeding that authorized by law.” BBG also obligated funds before the funds were available by allowing contractors to work without contracts in place via a “pre-approval” process. OIG identified two reportable violations of the ADA relating to BBG’s “pre-approval process.” Further, BBG did not adequately promote full and open competition when soliciting for offers or awarding contracts, did not adequately determine that contract prices were fair and reasonable, and did not perform contractor responsibility determinations. As a result, BBG did not have reasonable assurance that its requirements were performed in the most effective and economical manner. In addition, OIG identified \$419,020 in funds that could have been put to better use in relation to contracts that were never executed, possibly because of lack of planning, and \$3.5 million in questioned costs because of unsupported contract pricing. OIG has determined that BBG’s actions have resolved all 38 recommendations from this audit and has since closed 14 of the recommendations.¹⁵
- OIG also reported several weaknesses in contract administration, procedures, and oversight in its inspection of OCB.¹⁶ For example, the inspection team found instances of noncompliance with the Federal Acquisition Regulation (FAR) during the presolicitation, preaward, and contract administration phases. During the presolicitation and precontract award phases, the inspectors did not find documentation to support the performance of acquisition planning and market research, as required by FAR 7.102 and FAR 10.001(a), respectively. During the contract administration phase, the contracting officers did not always document involvement in contract administration, as stated in FAR 1.602-2. For all three of the above acquisition phases, the contract files did not always have adequate documentation in accordance with FAR 4.801(b) and FAR 4.802(a)(1) and (2). The inspection also found that BBG’s Office of Contracts was not appointing, in writing, the contracting officer’s representatives for OCB contracts, as required by the FAR.

¹³ *Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions* (AUD-CG-IB-14-26, June 2014).

¹⁴ *Ibid.*

¹⁵ The criteria for “resolved” and “closed” recommendations included in OIG audits and inspections of both U.S. Department of State and BBG operations are described in 1 *Foreign Affairs Manual* 056.1.

¹⁶ *Inspection of the Office of Cuba Broadcasting* (ISP-IB-14-15, July 2014).

Weaknesses in Financial Management

During a financial statement audit, a deficiency in internal controls exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.¹⁷

- Although BBG received an unqualified opinion on its FY 2013 financial statements,¹⁸ an independent auditor identified material weaknesses in internal controls as well as reportable instances of noncompliance with certain laws and regulations that could have a material impact on the financial statements. In addition to the previously discussed grants management issues, the auditor reported several deficiencies with BBG's property, plant, and equipment processes. The audit also found that BBG lacked sufficient, reliable controls over its accounting and business processes to ensure that budgetary transactions were properly recorded, monitored, and reported. In addition to these material weaknesses, the auditor also reported noncompliance with a number of laws and regulations, including the FAR, ADA, and the Federal Managers' Financial Integrity Act. During the audit of BBG's FY 2014 financial statements, the independent auditor concluded that BBG had not addressed the material weaknesses and instances of noncompliance identified during the previous audit.
- In the inspection of OCB, OIG identified several management control weaknesses in administrative operations, including lack of financial management review for unliquidated obligations. As of September 3, 2013, prior to the on-site inspection, OCB had approximately \$2.2 million in unliquidated obligations for FY 2013. Given the large amount of unliquidated obligations in FY 2013, the inspection team determined that OCB has not been following its process to periodically review obligations and certify whether they were still valid or whether funds or available balances could be deobligated. Since the inspection, OCB has reduced to zero unliquidated obligations from 2009 to 2012.

Inadequate Information Security

During the FY 2014 audit of BBG's compliance with the Federal Information Security Management Act (FISMA) of 2002,¹⁹ OIG identified control weaknesses that represented a significant deficiency to **[Redacted] (b) (5)**. The Office of Management and Budget (OMB) defines a significant deficiency as follows:

¹⁷ Statement on Auditing Standards 115, American Institute of Certified Public Accountants, <<http://www.aicpa.org/Research/Standards/AuditAttest/DownloadableDocuments/AU-00325.pdf>>.

¹⁸ *Independent Auditor's Report on the Broadcasting Board of Governors 2013 and 2012 Financial Statements* (AUD-FM-IB-14-14, Dec. 2013).

¹⁹ *Audit of the Broadcasting Board of Governors Information Security Program* (AUD-IT-IB-15-13, Oct. 2014).

...a weakness in an agency's overall information systems security program or management control structure, or within one or more information systems that significantly restricts the capability of the agency to carry out its mission or compromises the security of its information, information systems, personnel, or other resources, operations, or assets.²⁰

With regard to BBG, OIG identified weaknesses in 9 of 11 information security program areas that considerably impacted BBG's information security program. The most significant weaknesses were related to the risk management framework, continuous monitoring program, configuration management, and the incident response and reporting program. In addition, information security program areas that needed improvement included Plans of Action and Milestones, remote access, identity and access management, and security training. Since FY 2010, the weak (and in some cases lack of) security controls adversely affected the confidentiality, integrity, and availability of information and information systems. As an example, the weak security controls resulted in the hacking of BBG websites in 2011. According to BBG, it recognizes that it is a target for international intrusion into its information systems and is working to strengthen its information security.

²⁰ OMB Memorandum M-14-04, *FY 2013 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management*, Nov. 2013.

RECOMMENDATIONS

OIG makes the following recommendations:

Recommendation 1: OIG recommends that the Broadcasting Board of Governors establish milestones to implement all open recommendations, to include completion of the acquisition and procurement action plan dated January 2015. For reference, Appendix A contains a list of all open and closed recommendations issued to BBG over the last 3 fiscal years. Open and resolved (but not implemented) recommendations are highlighted.

Management Response: BBG concurred with the recommendation and will work to establish milestones to implement the open recommendations. With respect to recommendations in OIG's audit of BBG's acquisition functions, BBG submitted its updated action plan, which is reproduced in Appendix B.

OIG Reply: OIG considers this recommendation resolved. This recommendation can be closed when OIG reviews and accepts documentation that BBG has established milestones to implement all open recommendations.

Recommendation 2: OIG recommends that the Broadcasting Board of Governors develop a plan to monitor and sustain actions previously taken (i.e. closed recommendations) to address the concerns discussed in this alert.

Management Response: BBG concurred with the recommendation and will work to develop a plan to monitor and sustain actions previously taken to address issues discussed in this management alert.

OIG Reply: OIG considers this recommendation resolved. This recommendation can be closed when BBG submits its plan to OIG.

BBG's full response is included in Appendix C. BBG notes that all but 2 of the 165 recommendations referenced in this alert have been closed or resolved by BBG, and that it is "working aggressively to close all of the recommendations." OIG agrees that BBG management has made significant progress in addressing the deficiencies identified by our audits and inspections. However, 75 of the recommendations listed in Appendix A are resolved but not fully closed, meaning that BBG has yet to implement the agreed-upon actions. Moreover, it is imperative for BBG to build upon and sustain the progress it has made to ensure that deficiencies do not recur and to develop a compliance-oriented culture at BBG.

APPENDIX A: STATE DEPARTMENT OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 and 3/17/2015 WITH BBG AS THE ACTION OFFICE

REC. STATUS

Unresolved. No agreement between OIG and management on the recommendation or proposed corrective action (remains open).

Resolved. Agreement on the recommendation and proposed corrective action (remains open).

Closed. Agreed-upon corrective action is complete

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT/IB-12-15	BBG's Information Security Program	1	11/14/2011	11/14/2011	11/14/2012	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer ensure that the selected system inventory management software tool is acquired and implemented and a process is developed to update, not less than annually, the Broadcasting Board of Governors (BBG) system inventory when changes are made to those information systems operated by or under the control of BBG or by third-party contractors or agencies on behalf of BBG, as required by National Institute of Standards and Technology Special Publication 800-53, Revision 3.

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT/IB-12-15	BBG's Information Security Program	2	11/14/2011	11/14/2011	11/14/2012	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer complete the development and implementation of security configuration procedures and periodically assess compliance with the implemented procedures, as required by National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT/IB-12-15	BBG's Information Security Program	3	11/14/2011	11/14/2011	11/14/2012	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer develop procedures to ensure that security controls are properly managed and maintained for all systems that access the Broadcasting Board of Governors network, as required by National Institute of Standards and Technology Special Publication 800-53, Revision 3.

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT/IB-12-15	BBG's Information Security Program	4	11/14/2011	11/14/2011	11/14/2012	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer update the security awareness training policy requiring all new personnel to attend initial and refresher security awareness training and enforce consequences of noncompliance for personnel who do not successfully complete the security awareness training, as required by National Institute of Standards and Technology Special Publication 800-53, Revision 3, and the Broadcasting Board of Governors information security policies.
AUD-IT/IB-12-15	BBG's Information Security Program	5	11/14/2011	11/14/2011	11/14/2012	Closed-Implemented	Unclassified	We recommend that the Chief Information Officer develop a policy requiring responsible managers to review and update Plans of Action and Milestones and assess the timeliness of corrective actions to determine whether additional resources may need to be allocated to prevent delays, as required by Office of Management and Budget Memorandum M-11-33, "FY

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
								2011 Reporting Instructions for the Federal Information Security Management Act and Agency Privacy Management", September 14, 2011.
AUD-IT/IB-12-15	BBG's Information Security Program	6	11/14/2011	11/14/2011	11/14/2012	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer implement the process and software tool to assess the adequacy of the security configurations of third-party devices that request access to the Broadcasting Board of Governors network and grant access only to properly configured devices, as required by National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT/IB-12-15	BBG's Information Security Program	7	11/14/2011	11/14/2011	11/14/2012	Closed-Implemented	Unclassified	We recommend that the Chief Information Officer establish policies and procedures to restrict the use of guest, test, and shared user accounts to ensure user accountability, in accordance with National Institute of Standards and Technology Special Publication 800-53, Revision 3.

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AUD-IT/IB-12-15	BBG's Information Security Program	8	11/14/2011	11/14/2011	11/14/2012	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer establish policies and procedures requiring system owners to notify account managers when information system users are terminated or transferred or when information system usage or need-to know/need-to-share changes are made, in accordance with National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT/IB-12-15	BBG's Information Security Program	9	11/14/2011	11/14/2011	11/14/2012	Closed-Implemented	Unclassified	We recommend that the Chief Information Officer implement procedures to monitor and review compliance with the password reset procedures to ensure that Help Desk personnel enforce the password reset policy, which requires the requesting user to be physically present to allow Help Desk personnel to verify the user's identity.

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AUD-IT/IB-12-15	BBG's Information Security Program	10	11/14/2011	11/14/2011	11/14/2012	Closed-Implemented	Unclassified	We recommend that the Chief Information Officer develop and implement policies and procedures to perform routine vulnerability assessments for all major systems and general support systems, as required by National Institute of Standards and Technology Special Publication 800-53A.
AUD-IT/IB-12-15	BBG's Information Security Program	11	11/14/2011	11/14/2011	11/14/2012	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer ensure that the Director of Disaster Recovery and Business Continuity develop and implement contingency planning policies and procedures; develop contingency plans for the Broadcasting Board of Governors (BBG) infrastructure (network) and its major systems; provide contingency planning training to personnel who are responsible for the recovery of the network and systems; perform periodic testing of BBG's contingency plans; and update the plan based on lessons learned, as required by National Institute of Standards and Technology

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

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AUD-IT/IB-12-15	BBG's Information Security Program	12	11/14/2011	11/14/2011	11/14/2012	Closed-Implemented	Unclassified	Special Publication 800-34, Revision 1. We recommend that the Chief Information Officer develop and implement a complete and comprehensive process that meets United States-Computer Emergency Readiness Team's (US-CERT) requirements for identifying, reporting, and resolving computer security incidents in a timely manner, as required by National Institute of Standards and Technology Special Publication 800-61, Revision 1, and Office of Management and Budget Memorandum M-07-16. Also, BBG's Computer Security Incident Management Policy should be revised to include clear and comprehensive guidance for the identification, prioritization, and notification of security incidents, both internally and to US-CERT. The security incident identification and notification procedures should also specifically address the procedures for responding to security

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								incidents involving the breach of personally identifiable information whether the breach occurred in electronic or paper format.
AUD-IB-12-32	BBG Compliance With Improper Payments Info Act	1	3/12/2012	3/12/2012	3/12/2013	Closed	Unclassified	OIG recommends that the Office of Financial Operations either perform a risk assessment to identify programs at high risk of improper payments or formally document the factors used to reach its conclusion that a risk assessment is not needed. If the Office of Financial Operations performs a risk assessment, the process should be formally documented in its policies. If a risk assessment is not performed, the Office of Financial Operations should document the Chief Financial Officer's approval. In addition, the Office of Financial Operations should reassess the decision annually to ensure that any changes in operating conditions are considered.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IB-12-32	BBG Compliance With Improper Payments Info Act	2	3/12/2012	3/12/2012	3/12/2013	Closed	Unclassified	OIG recommends that the Office of Financial Operations either implement a recapture audit program for domestic and overseas payments or perform and document a cost-benefit analysis supporting its decision not to implement recapture audit techniques. If the Office of Financial Operations implements a recapture audit program, the process should be formally documented in its policies. If the Office of Financial Operations chooses not to implement a recapture audit program, it should formally notify both the Office of Management and Budget and OIG and provide sufficient documentation to support the decision.
AUD-IB-12-32	BBG Compliance With Improper Payments Info Act	3	3/12/2012	3/12/2012	3/12/2013	Closed	Unclassified	OIG recommends that the Office of Financial Operations develop a standardized process to ensure that all required information is included in the Broadcasting Board of Governors Performance and Accountability Report and that

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-CG-12-24	BBG Suspension and Debarment Process	1	2/28/2012	2/28/2012		Resolved	Unclassified	the process is formally documented in its policies. OIG recommends that the Director, Broadcasting Board of Governors, strengthen worldwide suspension and debarment policies and procedures in compliance with Executive Order 12689 and implemented through the Federal Acquisition Regulation, subpart 9.4, "Debarment, Suspension, and Ineligibility."
AUD-CG-12-24	BBG Suspension and Debarment Process	2	2/28/2012	2/28/2012		Resolved	Unclassified	OIG recommends that the Director, Broadcasting Board of Governors (BBG), comply with the requirements of Federal Acquisition Regulation subpart 42.1502(b) and develop procedures to ensure that all pertinent contractor performance information is recorded in BBG's automated procurement database when it becomes available and in other appropriate Government-wide databases that track and monitor contractor performance.

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ISP-IB/C-12-34	CFR BBG's Operations, Thailand	1	6/19/2012	9/27/2012	9/27/2012	Closed-Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors, as it finalizes its proposal for the International Broadcasting Bureau Thailand Transmitting Station, should confirm that the plan for implementation complies with U.S. and Thai laws and regulations.
ISP-IB/C-12-34	CFR BBG's Operations, Thailand	2	6/19/2012	9/27/2012	9/27/2012	Closed-Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors, in coordination with Embassy Bangkok, should arrange for the combination of the cashier's safe at the International Broadcasting Bureau Thailand Transmitting Station to be changed during the next visit from the Embassy Bangkok regional security office.
ISP-IB/C-12-34	CFR BBG's Operations, Thailand	3	6/19/2012	9/27/2012	9/27/2012	Closed-Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors, in coordination with Embassy Bangkok, should issue chemical/biological response equipment to the staff at the International Broadcasting Bureau Thailand Transmitting Station and conduct annual refresher briefings in the use of the equipment.

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ISP-IB/C-12-34	CFR BBG's Operations, Thailand	4	6/19/2012	9/27/2012	3/21/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that the senior procurement executive designate the Bangkok regional marketing and program placement officer as a grants officer representative and ensure that he is properly trained for these duties.
ISP-IB-12-40	Nairobi, Kenya	1	8/3/2012	12/13/2012	3/20/2013	Closed	NoForn-Sensitive But Unclass	The Broadcasting Board of Governors should require that the Voice of America Nairobi News Bureau conduct and document unannounced cash verifications on a monthly basis.
ISP-IB-12-40	Nairobi, Kenya	2	8/3/2012	12/13/2012	12/13/2012	Closed - Acceptable Alternative Compliance	Sensitive but Unclassified	The Broadcasting Board of Governors should require that the Voice of America Nairobi News Bureau coordinate with the Voice of America Central News Division to subscribe to the International Cooperative Administrative Support Services framework for any information technology support from Embassy Nairobi.
ISP-IB-12-40	Nairobi, Kenya	3	8/3/2012	12/13/2012	3/20/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that the Voice of America Nairobi News Bureau implement a

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-12-40	Nairobi, Kenya	4	8/3/2012	12/13/2012	12/13/2012	Closed	Sensitive but Unclassified	leave plan that will allow for appropriate office coverage. The Broadcasting Board of Governors should require that the Voice of America Nairobi News Bureau implement a procedure whereby the bureau chief or the acting bureau chief signs all locally employed staff timesheets.
ISP-IB-12-40	Nairobi, Kenya	5	8/3/2012	12/13/2012	3/20/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that the Voice of America Nairobi News Bureau establish contractual documents for cleaning, security alarm maintenance, and repair services at the news bureau.
ISP-IB-12-40	Nairobi, Kenya	6	8/3/2012	12/13/2012	3/20/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that the Voice of America provide the Nairobi News Bureau with updated guidance on operations and procedures, including information on appropriate Voice of America and Broadcasting Board of Governors offices in Washington and in the region.
ISP-IB-12-43	BBG-Radio Free Europe & Radio Liberty	1	8/16/2012	12/13/2012	8/20/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that Radio Free Europe/Radio

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								Liberty assign a lead information systems security officer to develop security plans and perform critical security reviews.
ISP-IB-12-43	BBG-Radio Free Europe & Radio Liberty	2	8/16/2012	12/13/2012	3/20/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that Radio Free Europe/Radio Liberty install additional closed-circuit television camera coverage in news bureaus located in high-threat countries.
ISP-IB-12-43	BBG-Radio Free Europe & Radio Liberty	3	8/16/2012	12/13/2012	3/20/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that Radio Free Europe/Radio Liberty conduct drills of its disaster recovery and other emergency plans at least annually and document the results of such drills.
ISP-IB-12-43	BBG-Radio Free Europe & Radio Liberty	4	8/16/2012	12/13/2012	3/20/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that Radio Free Europe/Radio Liberty designate which personnel require "go-bags" in the event of an emergency and procure appropriately-equipped go-bags for those personnel.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-12-43	BBG-Radio Free Europe & Radio Liberty	5	8/16/2012	12/13/2012	5/31/2013	Closed	Sensitive but Unclassified	The Broadcasting Board of Governors should require that Radio Free Europe/Radio Liberty designate alternative locations to be used as safe havens to accommodate all on-duty personnel, equip the safe havens with adequate supplies of food and water, and conduct drills to familiarize employees with their locations.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	1	11/14/2012	11/14/2012	10/30/2013	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer ensure that security configuration standards and procedures are completed, as required by the National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	2	11/14/2012	11/14/2012	10/30/2013	Closed-Implemented	Unclassified	We recommend that the Broadcasting Board of Governors develop and implement policies to require all agency entities with systems that connect to the Broadcasting Board of Governors network to abide by the security policies and requirements established by the Broadcasting Board of Governors Information

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								Technology Department and grant the Chief Information Officer the necessary authority to enforce consequences for noncompliance.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	3	11/14/2012	11/14/2012	10/30/2013	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer ensure that user accounts are properly configured and maintained in accordance with the Broadcasting Board of Governors policies. If the Broadcasting Board of Governors determines that exceptions to the implemented policies may be necessary, the Broadcasting Board of Governors should identify, assess, and document the associated risks. If the Broadcasting Board of Governors further determines that the identified risks are acceptable, the exceptions should be documented and approved by information technology management.

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AUD-IT-IB-13-04	Audit of BBG Information Security Program	4	11/14/2012	11/14/2012	10/30/2013	Closed-Implemented	Unclassified	We recommend that the Chief Information Officer ensure that procedures as stated within the Broadcasting Board of Governors Computer Security Incident Management Policy are followed to ensure that security incidents are properly reported, as required by the United States Computer Emergency Readiness Team's Federal Incident Reporting Guidelines.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	5	11/14/2012	11/14/2012	10/30/2013	Closed-Implemented	Unclassified	We recommend that the Chief Information Officer develop and implement a formal sanction process for personnel who do not successfully complete the security awareness training, as required by the National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	6	11/14/2012	11/14/2012	10/30/2013	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend the Chief Information Officer ensure that the Broadcasting Board of Governors Plans of Action and Milestones program is developed in accordance with its policy, which requires the Broadcasting Board of

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
								Governors Plans of Action and Milestones to include the data elements found in Office of Management and Budget Memorandum M-02-01.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	7	11/14/2012	11/14/2012	10/30/2013	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer implement procedures to assess the adequacy of the security configurations of third-party devices that request access to the Broadcasting Board of Governors network and grant access only to properly configured devices, as required by the National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	8	11/14/2012	11/14/2012	10/30/2013	Closed-Implemented	Unclassified	We recommend that the Chief Information Officer ensure that the Information Technology Director create and implement a standardized process to collect information used to develop and subsequently update the Broadcasting Board of Governors system inventory and update the general support system's security plan control for CM-8, "Information System

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								Component Inventory," specifically, the organizationally defined frequency of inventory assessments, as required by the National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT-IB-13-04	Audit of BBG Information Security Program	9	11/14/2012	11/14/2012	10/30/2013	Closed, & Re-issued, By Follow-up Review	Unclassified	We recommend that the Chief Information Officer ensure that the Director of Disaster Recovery and Business Continuity develop and implement contingency planning policies and procedures, develop contingency plans for the Broadcasting Board of Governors infrastructure (network) and its major systems, provide contingency planning training to personnel who are responsible for the recovery of the network and systems, perform periodic testing of the Broadcasting Board of Governors contingency plans, and update the plan based on lessons learned as required by National Institute of Standards

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								and Technology Special Publication 800-34, Revision 1.
ISP-IB-13-07	BBG-Broadcasting Board of Governors	1	1/10/2013	5/6/2013	10/21/2014	Closed-Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should implement a chief executive officer position as outlined in its 2012-2016 Strategic Plan, "Impact Through Innovation and Integration."
ISP-IB-13-07	BBG-Broadcasting Board of Governors	2	1/10/2013	5/6/2013	5/7/2014	Closed - Acceptable Alternative Compliance	Sensitive but Unclassified	The Broadcasting Board of Governors should remove Governors from the corporate boards of Radio Free Asia and Middle East Broadcasting Networks and establish a new mechanism for selecting corporate board members.

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ISP-IB-13-07	BBG- Broadcasting Board of Governors	3	1/10/2013	5/6/2013	5/7/2014	Closed- Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should establish a policy on meeting attendance that includes sanctions for noncompliance.
ISP-IB-13-07	BBG- Broadcasting Board of Governors	4	1/10/2013	5/6/2013	2/18/2014	Closed- Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should update and implement its nondisclosure policy to reference relevant exemptions from the Government in the Sunshine Act and to include sanctions for noncompliance.
ISP-IB-13-07	BBG- Broadcasting Board of Governors	5	1/10/2013	5/6/2013	5/7/2014	Closed- Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should adopt the use of a consent agenda to address routine matters in all Board meetings.
ISP-IB-13-07	BBG- Broadcasting Board of Governors	6	1/10/2013	5/6/2013	5/7/2014	Closed- Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should coordinate with the Office of Management and Budget and the Congressional Oversight Committees to formally propose and implement new legislation for U.S. international broadcasting that includes enhancing authority for the Board Chairman in Board governance, focusing the Board on its strategic oversight and direction roles,

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								changing the membership of the corporate board for Radio Free Europe/Radio Liberty, prohibiting Governors from sitting on the corporate boards of Radio Free Asia and Middle East Broadcasting Networks, and implementing a mechanism for censure or removal of Governors for actions harmful to the ability of the Board to perform its duties.
ISP-IB-13-07	BBG-Broadcasting Board of Governors	7	1/10/2013	5/6/2013	5/7/2014	Closed-Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should implement a written comprehensive travel policy that sets clear guidelines on all facets of official travel (domestic and international), including the authorization and approval process, processes for visas and country clearances, a clear statement of objectives and strategic goals in the travel authorization, a report on impact, and follow-up actions.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-13-11	Inspection of the International Broadcasting Bureau's Philippines Transmitting Station	1	2/8/2013	3/8/2013	5/31/2013	Closed	Sensitive but Unclassified	The International Broadcasting Bureau should publish an updated standard operating procedure to designate a single locally employed receiving officer, centralize receiving procedures for accountable property, and maintain separation of duties during the annual inventory process.
ISP-IB-13-11	Inspection of the International Broadcasting Bureau's Philippines Transmitting Station	2	2/8/2013	3/8/2013	5/31/2013	Closed	Sensitive but Unclassified	The International Broadcasting Bureau should review and publish procedures to require daily reconciliation of the Class B cashier's operating advance on days when the cashier conducts transactions.
ISP-IB-C-13-20	Compliance Follow-up Review of the International Broadcasting Bureau Germany Transmitting Station	1	2/27/2013	4/10/2013	8/20/2013	Closed	Sensitive but Unclassified	The International Broadcasting Bureau should implement a standard operating procedure for administering, configuring, and maintaining the International Broadcasting Bureau Germany Transmitting Station's administrative network.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-C-13-20	Compliance Follow-up Review of the International Broadcasting Bureau Germany Transmitting Station	2	2/27/2013	4/10/2013	8/20/2013	Closed	Sensitive but Unclassified	The International Broadcasting Bureau should implement an information technology training plan for locally employed systems staff at the International Broadcasting Bureau Germany Transmitting Station.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	1	9/26/2013	3/13/2014		Resolved	Sensitive but Unclassified	The Broadcasting Board of Governors should implement a comprehensive strategy for U.S. international broadcasting to Russia that includes all Broadcasting Board of Governors entities operating in or broadcasting to Russia.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	2	9/26/2013	3/13/2014	3/24/2014	Closed-Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should require the Voice of America Russian Service and the Radio Free Europe/Radio Liberty Russian Service to implement specific collaborative actions for their respective news bureaus, as outlined in the Broadcasting Board of Governors' 5-year strategic plan.

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ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	3	9/26/2013	3/13/2014		Resolved	Sensitive but Unclassified	The Voice of America should conduct a 360-review of the Eurasia Division director and counsel him accordingly.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	4	9/26/2013	3/13/2014	9/24/2014	Closed-Implemented	Sensitive but Unclassified	The International Broadcasting Bureau, Office of Strategy and Development, in coordination with the Voice of America should implement an official policy detailing an internal mechanism for affiliate partnerships without a contract.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	5	9/26/2013	3/13/2014	9/24/2014	Closed-Implemented	Sensitive but Unclassified	The International Broadcasting Bureau, Office of Contracts, should appoint officially in writing a contracting officer's representative for the Voice of America Russian Service contracts in accordance with Federal Acquisition Regulations.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	6	9/26/2013	3/13/2014		Resolved	Sensitive but Unclassified	The International Broadcasting Bureau should implement a travel policy that defines appropriate disciplinary actions for misuse of official government travel cards.
ISP-IB-13-50	Inspection of U.S. International	7	9/26/2013	3/13/2014	9/24/2014	Closed-Implemented	Sensitive but Unclassified	The Voice of America should require that the Moscow News Bureau correspondent take

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	Broadcasting to Russia							refresher courses in contracting as required by Federal regulations.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	8	9/26/2013	3/13/2014	3/24/2014	Closed-Implemented	Sensitive but Unclassified	The Voice of America should require that the Moscow News Bureau conduct and document unannounced cash verifications on a monthly basis.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	9	9/26/2013	3/13/2014		Resolved	Sensitive but Unclassified	The Voice of America should require the Moscow News Bureau to implement time and attendance procedures in accordance with the Broadcasting Board of Governors Manual of Administration and the Department of State's regulations.
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	10	9/26/2013	3/13/2014		Resolved	Sensitive but Unclassified	The Voice of America should require the Moscow News Bureau to finalize a comprehensive inventory of all its property and implement written procedures for keeping accurate inventory and disposition records on an annual basis.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-13-50	Inspection of U.S. International Broadcasting to Russia	11	9/26/2013	3/13/2014	9/24/2014	Closed-Implemented	Sensitive but Unclassified	The Voice of America should provide assistance to the VOA Moscow News Bureau in conducting a comprehensive review of its administrative processes and procedures and implementing corrective actions.
ISP-IB-13-49	Inspection of Voice of America Latin America Division	1	9/26/2013	3/13/2014	6/3/2014	Closed-Implemented	Sensitive but Unclassified	The Voice of America should conduct a formal review of staffing, workload, processes, and procedures in the Voice of America Latin America Division's radio production unit and implement an action plan that addresses deficiencies.
ISP-IB-13-49	Inspection of Voice of America Latin America Division	2	9/26/2013	3/13/2014	6/3/2014	Closed-Implemented	Sensitive but Unclassified	The Broadcasting Board of Governors should require the Voice of America and the Office of Cuba Broadcasting to implement specific collaborative actions respectful of their different missions, as outlined in the Broadcasting Board of Governors 2012-2016 strategic plan.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-13-49	Inspection of Voice of America Latin America Division	3	9/26/2013	3/13/2014		Resolved	Sensitive but Unclassified	The International Broadcasting Bureau, Office of Contracts, should implement contract administration procedures for the Voice of America Latin America Division contracts in accordance with Federal Acquisition Regulations.
ISP-IB-13-49	Inspection of Voice of America Latin America Division	4	9/26/2013	3/13/2014	7/30/2014	Closed-Implemented	Sensitive but Unclassified	The International Broadcasting Bureau, Office of Contracts, should designate officially contracting officer's representatives in the Voice of America Latin America Division and include such information in the contracting files in accordance with Federal Acquisition Regulations.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	1	10/30/2013	10/30/2013	10/30/2014	Closed-Implemented	Unclassified	OIG recommends that the System Owners, Information Owners, and the Chief Information Officer/Chief Technology Officer assess the data categorization for information systems, in accordance with Federal Information Processing Standard 199, and implement the corresponding National Institute of Standards and Technology Special Publication 800-53, Revision

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AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	2	10/30/2013	10/30/2013	10/30/2014	Closed- Implemented	Unclassified	OIG recommends that the System Owners and Chief Information Officer/Chief Technology Officer prioritize resources to perform security impact analyses to assess the differences in National Institute of Standards and Technology Special Publication 800-53, Revision 3, control families and their impact to the state of security on the systems and reauthorize the systems.

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AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	3	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Broadcasting Board of Governors prioritize resources to perform a privacy impact assessment for the Privacy Information Enclave in accordance with Office of Management and Budget Memorandum M-12-20.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	4	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Chief Information Officer/Chief Technology Officer, in coordination with the Information Security Management Division, finalize and implement an enterprise-wide continuous monitoring strategy that includes a continuous monitoring policy and assesses the security state of information systems in a manner consistent with Federal Information Security Management Act requirements, Office of Management and Budget policy, and applicable National Institute of Standards and Technology guidelines.

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AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	5	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Chief Information Officer/Chief Technology Officer prioritize resources to complete entity-wide and system specific contingency planning documents for all information systems and conduct necessary testing in accordance with National Institute of Standards and Technology (NIST) Special Publication (SP) 800-34, Revision 1, and NIST SP 800-53, Revision 3.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	6	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Information Security Management Division update and implement its incident response policy in accordance with National Institute of Standards and Technology Special Publication 800-61, Revision 2.

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AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	7	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends the Chief Information Officer/Chief Technology Officer ensure that Broadcasting Board of Governors Plans of Action and Milestones (POA&M) include all required elements in accordance with its Information Security POA&M Policy, to include severity of the weakness, responsible organization, estimated funding resources, completion date, key milestones and changes, source of the weakness, and the status.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	8	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Enterprise Networks and Storage Division, under the Office of the Chief Information Officer/Chief Technology Officer, implement procedures to assess the adequacy of the security configurations of mobile computers that request access to the Broadcasting Board of Governors network and grant access only to properly configured and patched devices in accordance with National Institute of Standards and Technology

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								Special Publication 800-53, Revision 3.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	9	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Chief Information Officer/Chief Technology Officer verify that U.S. Government Configuration Baseline configuration standards are implemented and compliance with the implemented standards is periodically assessed in accordance with National Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	10	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Chief Information Officer/Chief Technology Officer follow the Broadcasting Board of Governors Change Management Policy, to "test and disseminate Microsoft operating system and application patches released on the second Tuesday of each month in a way that ensures complete coverage of workstations and laptops while avoiding operational downtime by rigorously testing the patches prior to general release to ensure

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AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	11	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	application compatibility and seamless functionality." OIG recommends that the Chief Information Officer/Chief Technology Officer and System Owners ensure that user accounts are properly maintained in accordance with Broadcasting Board of Governors (BBG) Identification and Authentication Policy and the BBG/IBB/VOA Password Policy.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	12	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Office of Security, in coordination with the Chief Information Officer/Chief Technology Officer, complete the issuance of Personal Identity Verification cards as required by Homeland Security Presidential Directive 12.
AUD-IT-IB-14-02	Audit of Broadcasting Board of Governors Information Security Program FY 2013	13	10/30/2013	10/30/2013	10/30/2014	Closed, & Re-issued, By Follow-up Review	Unclassified	OIG recommends that the Information Security Management Division, in coordination with the Chief Information Officer/Chief Technology Officer, prioritize resources to develop and implement a role-based security training program in accordance with National

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								Institute of Standards and Technology Special Publication 800-53, Revision 3.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	1	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the Board of Governors develop an action plan to implement and track a restructuring of the acquisition process within the International Broadcasting Bureau to ensure that all procurements comply with Federal and agency procurement policies. The action plan must have measurable goals and milestones.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	2	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the Board of Governors develop and implement enforcement mechanisms to ensure accountability for compliance with the action plan developed in response to Recommendation 1. This must include regular monitoring and evaluation of the

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
								acquisition function and compliance with the action plan.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	3	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations adhere to the conditions stated in 22 U.S.Code 6206 for hiring personal services contractors; specifically, a determination of resources needed should be made; the Director should approve the employment of each personal services contractor; and contract length, including options, should not exceed 2 years.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	4	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, update its training curriculum to ensure that contracting officers and other responsible contracting officials are appropriately trained to award and administer personal services contracts in accordance with the statutory requirements as defined by the Personal Services Contracting Pilot Program.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	5	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, in coordination with the Office of the Chief Financial Officer, develop and implement policies and procedures to ensure that funds are available at the beginning of the period of performance for each contract, which should include the tracking of contract period of performance and the maintenance of appropriate documentation within the contract file. If funds are not available for the entire term of a contract because of a

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								continuing resolution, a subject to availability clause should be included in the terms and conditions of the contract, per the Federal Acquisition Regulation.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	6	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau develop and implement fund control regulations, obtain approval from the Office of Management and Budget for the fund control regulations, and post the fund control regulations on its Web site, as required by Office of Management and Budget Circular A-11.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	7	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures and implementation guidance for conducting acquisition planning, in accordance with the Federal Acquisition Regulation. Specifically, criteria and thresholds should be established to dictate when a written acquisition plan is needed and guidance should establish what types of documentation should be maintained in the contract file.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	8	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures and implementation guidance for conducting market research, in accordance with the Federal Acquisition Regulation. Specifically, criteria should be established to dictate the type and extent of market research to be performed for each procurement action and what types of documentation

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								should be maintained in the contract file.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	9	6/13/2014	6/13/2014	11/26/2014	Closed-Implemented	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, cease the use of quarterly sources sought announcements for awarding contracts.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	10	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop internal policies and procedures and implementation guidance to ensure compliance with the Competition in Contracting Act and Federal Acquisition Regulation regarding the publication of contract actions.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	11	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop updated internal policies and procedures and implementation guidance to ensure that all offers are evaluated for each proposed contract action and adequately documented in the contract file.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	12	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop internal policies and procedures and implementation guidance to ensure that justifications for other than full and open competition are adequately documented and only utilized in accordance with Federal Acquisition Regulation guidance.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	13	6/13/2014	6/13/2014	6/13/2014	Closed	Unclassified	OIG recommends that the Director of Global Operations provide guidance to all offices within the International Broadcasting Bureau to explain the role of the Office of Contracts and the requirement for all acquisitions to comply with the Competition in Contract Act and follow the Federal Acquisition Regulation, and to reinforce the authority of the Senior Procurement Executive.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	14	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau hold comprehensive training to ensure that all employees involved in the acquisition process are aware of the Competition in Contracting Act and Federal Acquisition Regulation as it relates to competition, as well as the implications of noncompliance.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	15	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop comprehensive policies and procedures and implementation guidance that directs contracting officers how to determine and document whether contract prices are fair and reasonable.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	16	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, update its training curriculum to ensure that contracting officers and other responsible contracting officials are appropriately trained to conduct and document contract price determinations.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	17	6/13/2014	6/13/2014	11/26/2014	Closed-Implemented	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, review each of the contracts notated in Table 1 of Appendix A of the audit report to determine whether the contract price was fair and reasonable in accordance with Federal regulations. For each contract in which the price was determined not to be fair and reasonable, assess whether the contract can be processed using the ratification authority in Federal Acquisition Regulation 1.602-3, and if so, ratify the contract. If the contract cannot be ratified, legal advice must be obtained to determine a resolution.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	18	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop and implement policies and procedures to provide guidance to contracting officers on the type and extent of contractor responsibility determinations to be made for each award and the types of

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								documentation that should be maintained in the contract file.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	19	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, update its policies and procedures for contractor requirements for the Data Universal Numbering System and registration within the Central Contracting Registry to ensure that these procedures are in accordance with the Federal Acquisition Regulation.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	20	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, update its training curriculum to ensure that contracting officers and other responsible contracting officials are appropriately trained to conduct and document responsibility determinations and to only allow exemptions under clearly defined circumstances in accordance with the Federal Acquisition Regulation or Office of Federal Procurement Policy guidance.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	21	6/13/2014	6/13/2014	6/13/2014	Closed	Unclassified	OIG recommends that International Broadcasting Bureau, Office of Contracts, develop policies and procedures and implementation guidance, which ensure that contracting officer's representatives (COR) are designated for every contract, and that this documentation clearly defines the COR's roles and responsibilities and is maintained in the contract file.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	22	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures and implementation guidance to ensure that contracting officers and contracting officer's representatives are fully aware of the type and extent of quality assurance procedures that should be performed in accordance with the Federal Acquisition Regulation and the type of documentation that should be maintained in the contract file as supporting evidence of quality assurance.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	23	6/13/2014	6/13/2014	11/26/2014	Closed-Implemented	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, review Contract BBG50-P-11-0009 and determine whether the contractor was paid an extra \$8,250 for work not performed. If this cost is determined unallowable, the Office of Contracts should seek reimbursement from the contractor.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	24	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, in coordination with Voice of America, English to Africa Language Service, develop policies and procedures and implementation guidance to ensure that contractors are not performing inherently governmental functions.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	25	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, in coordination with Voice of America, English to Africa Language Service, develop policies and procedures and implementation guidance to ensure that documentation is required for all contractor expenses to provide evidence that the funds were expended in an appropriate manner.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	26	6/13/2014	11/26/2014	11/26/2014	Closed-Implemented	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, determine whether the \$16,075 in unsupported costs for Contract BBG50-P-13-0600 were allowable, and if determined unallowable, recover those costs from the contractor.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	27	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures and implementation guidance that direct program officials regarding the use and extent of performance evaluations, including the use of rating tools and clear indicators of performance.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	28	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures and implementation guidance so that contracting officers are aware of how to utilize past performance evaluations when assessing potential

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								contractors.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	29	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop and implement a system to track contracting officers' training so that pertinent parties can be informed of missing training and resulting expired warrants.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	30	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures, to ensure that contracting officers obtain and maintain training requirements for compliance with the Federal Acquisition Certification for Contracting Officer program, including a course of action when

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requirements are not met.								
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	31	6/13/2014	6/13/2014	6/13/2014	Closed	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures, including a comprehensive training program, to ensure that contracting officer's representatives obtain and maintain training requirements in compliance with the Federal Acquisition Certification for Contracting Officer's Representatives program.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	32	6/13/2014	6/13/2014	11/26/2014	Closed-Implemented	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop and implement a system to track training for contracting officer's representatives so that pertinent parties can be informed of missing training and resulting expired certifications.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	33	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, update policies and procedures and develop implementation guidance that mandates the documentation to be included in each type of contract file.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	34	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop and implement policies and procedures to periodically perform quality control reviews of official contract files to determine compliance with internal guidance and the Federal Acquisition Regulation.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	35	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, update its training curriculum to ensure that contracting officers and other responsible contracting officials are periodically trained on the required contents for the official contract file.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	36	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, assess whether the unauthorized commitments related to Contract Nos. BBG28-F-11-0031 and BBG50-J-12-0709 can be processed using the ratification authority in Federal Acquisition Regulation 1.602-3, and if so, ratify the contracts. If the contracts cannot be ratified, legal advice must be obtained to determine a resolution.

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AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	37	6/13/2014	6/13/2014	11/26/2014	Closed-Implemented	Unclassified	OIG recommends that the International Broadcasting Bureau, Office of Contracts, develop policies and procedures and appropriate internal controls to ensure that contracting officers cannot sign above their warrant levels.
AUD-CG-IB-14-26	Audit of the Broadcasting Board of Governors Administration and Oversight of Acquisition Functions	38	6/13/2014	6/13/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations develop and implement an updated reporting structure for contracting officers that are embedded in program offices to ensure that all contracting officers are provided with proper oversight by the Office of Contracts.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	1	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The International Broadcasting Bureau, in coordination with the Office of Cuba Broadcasting, should implement oversight and contract administration procedures for Office of Cuba Broadcasting contracts, in accordance with the Federal Acquisition Regulation.

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ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	2	7/1/2014	10/24/2014	2/19/2015	Closed-Implemented	Sensitive but Unclassified	The International Broadcasting Bureau, in coordination with the Office of Cuba Broadcasting, should officially designate in writing contracting officer's representatives for Office of Cuba Broadcasting contracts, confirm that the designation letters are signed and dated, and include the designation letter in the contracting files, in accordance with the Federal Acquisition Regulation.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	3	7/1/2014	10/24/2014	10/24/2014	Closed-Implemented	Sensitive but Unclassified	The Office of Cuba Broadcasting, in coordination with the International Broadcasting Bureau, should require that contracting officer's representatives for purchase order vendor contracts comply with contract administration requirements outlined in designation letters and complete the contractor performance evaluation.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	4	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The International Broadcasting Bureau, in coordination with the Office of Cuba Broadcasting, should stop using blanket purchase agreements and purchase orders for purchase order vendor contracts and obtain personal services contract authority for all purchase order vendor contracts.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	5	7/1/2014	10/24/2014	10/24/2014	Closed-Implemented	Sensitive but Unclassified	The International Broadcasting Bureau, in coordination with the Office of Cuba Broadcasting, should review periodically the Office of Cuba Broadcasting's travel card usage.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	6	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuba Broadcasting should finalize the 2011-2012 and 2012-2013 annual performance evaluations for all employees.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	7	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuba Broadcasting should de-obligate \$188,015 in un-liquidated obligations for FYS 2009-2012, reprogram \$40,632 in un-liquidated obligations that have no-year budget authority, and implement a review system for future un-

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								liquidated obligations for potential de-obligation.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	8	7/1/2014	10/24/2014	10/24/2014	Closed-Implemented	Sensitive but Unclassified	The Office of Cuba Broadcasting, in coordination with the International Broadcasting Bureau, should terminate the current travel agreement of the acting general manager immediately and fill the general manager position with a full-time permanent employee.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	9	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuba Broadcasting should conduct and update inventory records, provide updated reports to the International Broadcasting Bureau, Property Management Office, and implement property internal controls procedures.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	10	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuba Broadcasting should stop using its current disposal practice and transfer all excess property to another Federal agency or dispose of it

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
								through the General Services Administration.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	11	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuba Broadcasting should perform an accurate capitalized property inventory and provide the report to the International Broadcasting Bureau, Property Management Office.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	12	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuba Broadcasting should implement issuance property management procedures for all nonexpendable and sensitive property.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	13	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuba Broadcasting should implement procedures for maintaining and retiring official records.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	14	7/1/2014	10/24/2014	2/19/2015	Closed-Implemented	Sensitive but Unclassified	The Office of Cuba Broadcasting should reduce the number of administrative duties of the security officer so more time can be devoted to the security portfolio.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	15	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	The Office of Cuban Broadcasting should conduct and document routine fire and intruder drills and identify safe rooms.
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	16	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	[Redacted] (b) (5), [Redacted] (b) (7)(F)
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	17	7/1/2014	10/24/2014		Resolved	Sensitive but Unclassified	
ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	18	7/1/2014	10/24/2014	2/19/2015	Closed-Implemented	Sensitive but Unclassified	

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ISP-IB-14-15	Inspection of the Office of Cuba Broadcasting	19	7/1/2014	10/24/2014	2/19/2015	Closed-Implemented	Sensitive but Unclassified	[Redacted] (b) (5), [Redacted] (b) (7)(F)
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	1	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors ensure that the employees responsible for monitoring Radio Free Europe/Radio Liberty (RFE/RL) meet with RFE/RL officials to gain a complete understanding of the after-employment benefits offered.
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	2	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors design and implement procedures to perform routine reviews of Radio Free Europe/Radio Liberty (RFE/RL) financial activity. At a minimum, these procedures should include periodic reviews of significant events and transactions and analyses of RFE/RL's financial statements and actuarial reports.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	3	9/24/2014			Unresolved	Unclassified	OIG recommends that the Broadcasting Board of Governors develop a process to review and approve significant contracts over \$350,000 for Radio Free Europe/Radio Liberty.
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	4	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors develop policies and procedures to ensure that information needed to oversee grantees is maintained in the grant files and to ensure that the relevant information is available for at least 7 years.
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	5	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors (BBG) review and revise its policies and procedures to clearly define the roles and responsibilities of the officials within BBG who are responsible for monitoring and overseeing Radio Free Europe/Radio Liberty.

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	6	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors (BBG) formally designate a grants analyst to monitor Radio Free Europe/Radio Liberty (RFE/RL). As part of the designation, BBG should ensure that the grants analyst's responsibilities are clearly communicated to that employee. Further, BBG should ensure that authority is formally provided to the grants analyst so that the analyst can obtain needed information from RFE/RL.
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	7	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends, once a grants analyst has been designated, that the Broadcasting Board of Governors ensure that the grants analyst obtains appropriate training related to grants monitoring.
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	8	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends, once a grants analyst has been designated, that the Broadcasting Board of Governors implement an effective communication methodology to ensure that information is shared between

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
								the Board of Governors and the grants analyst.
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	9	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors (BBG) design detailed annual budget submission formats and financial planning documents that will allow BBG to obtain details on unfunded liabilities at Radio Free Europe/Radio Liberty.
AUD-FM-IB-14-34	Audit of Radio Free Europe/Radio Liberty After-employment Benefits	10	9/24/2014	9/24/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors develop and implement a standardized process to produce effective comparability studies. The process should ensure that the studies are performed at prescribed intervals, include all benefits offered by Radio Free Europe/Radio Liberty to its domestic and overseas employees, and contain data and analyses that support

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Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
conclusions.								
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	1	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors perform a privacy impact assessment for its Office of Cuba Broadcasting Headquarters Network system, as required by National Institute of Standards and Technology Special Publication 800-37, Revision 1.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	2	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors perform a privacy impact assessment for its Privacy Information Enclave system, as required by National Institute of Standards and Technology Special Publication 800-37, Revision 1.

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	3	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors update the Certification and Accreditation Policy and Procedures to identify the responsible organizations for conducting annual security control assessments.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	4	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Broadcasting Board of Governors perform annual security control assessments on its Identity Management System.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	5	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations approve and implement a continuous monitoring policy that assesses the security state of information systems and is consistent with National Institute of Standards and Technology Special Publication 800-53, Revision 4.

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	6	10/30/2014	10/30/2014		Resolved	Sensitive but Unclassified	OIG recommends that the Broadcasting Board of Governors approve and implement a contingency plan policy for system-specific and entity-wide contingency plans, as required by the National Institute of Standards and Technology, Special Publication 800-34, Revision 1.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	7	10/30/2014	10/30/2014		Resolved	Sensitive but Unclassified	OIG recommends that the Director of Global Operations complete and implement system-specific and entity-wide contingency plans for all information systems and conduct necessary testing as required by the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-34, Revision 1, and NIST SP 800-53, Revision 4.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	8	10/30/2014			Unresolved	Unclassified	OIG recommends that the Director of Global Operations update server and workstation baseline procedures to include all of the U.S. Government Configuration Baseline configuration settings as required by the National Institute of Standards and

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
								Technology Special Publication 800-53, Revision 4.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	9	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations remediate all critical vulnerabilities as they are identified through periodic scanning.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	10	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations enforce the Broadcasting Board of Governors (BBG) Change Management Policy for all changes within the BBG environment.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	11	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Information Security Management Division update and implement the incident response policy and procedures to include preparation, detection and analysis, containment, eradication, recovery, and post-incident activity components as required by National Institute of Standards and Technology Special Publication 800-61, Revision 2.

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	12	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Information Security Management Division adhere to the Computer Security Incident Management Policy, when finalized, to include the appropriate category level for every documented incident.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	13	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Chief Information Security Officer, in coordination with the system owners and the Office of the Chief Information Officer, ensure that Broadcasting Board of Governors' Plans of Action and Milestones (POA&M) include all required elements in accordance with the Information Security POA&M Policy, to include severity of the weakness, responsible organization, estimated funding resources, completion date, key milestones and changes, source of the weakness, and the latest status.

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	14	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Enterprise Networks and Storage Division implement procedures to assess the adequacy of the security configurations of remote computers that request access to the Broadcasting Board of Governors' (BBG) network and grant access only to properly configured and patched devices, as required by BBG's Virtual Private Network (VPN) policy and VPN Access Acceptance Form.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	15	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Enterprise Networks and Storage Division ensure that multiple personnel are trained, and utilize that training, to disable Virtual Private Network tokens after they are reported lost or stolen in accordance with National Institute of Standards and Technology, Special Publication 800-53, Revision 4.

APPENDIX A: STATE OIG RECOMMENDATIONS ISSUED BETWEEN 10/1/2011 AND 3/17/2015 WITH BBG AS THE ACTION OFFICE

Report Number	Report Subject	Rec. #	Date Issued	Date Resolved	Date Closed	Rec. Status	Rec. Classification	Recommendation Text
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	16	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations and system owners ensure that user accounts are properly maintained in accordance with Broadcasting Board of Governors' Identification and Authentication Policy.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	17	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations, in coordination with the Office of Security, complete the issuance of Personal Identity Verification cards as required by Homeland Security Presidential Directive 12 and Office of Management and Budget guidelines.
AUD-IT-IB-15-13	Audit of the Broadcasting Board of Governors Information Security Program	18	10/30/2014	10/30/2014		Resolved	Unclassified	OIG recommends that the Director of Global Operations finalize and implement a role-based security training policy, as required by the National Institute of Standards and Technology Special Publication 800-53, Revision 4.

APPENDIX B: PROCUREMENT AUDIT ACTION PLAN

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
1	Develop action plan to implement & track a restructuring of the IBB acquisition process; ensure procurements comply with policies. Measurable goals required.	Andre Mendes/Suzie Carroll/Rob Bole	1/20/2015	The present document is the action plan. Measurable goals are included under specific items.
2	Develop and implement enforcement mechanisms for above.	Andre Mendes/Suzie Carroll/Rob Bole	12/31/2015	The Director of Contracts will regularly monitor and evaluate the acquisition functions and compliance with the action plan items. The Director's Office will regularly audit and evaluate the acquisition function and the Board's Advisory Committee will continue to be updated.
3	Develop policies, procedures, and implementation guidance for hiring personal services contractors in accordance with agency authority to use PSCs.	April Cabral/Cherylynn Peters	12/31/2015	The Agency has identified a need to hire a new procurement policy officer to further develop/draft this policy and other policies. This personnel action will be reposted in May 2015.
4	Training to ensure contracting officers et al trained to award and administer PSC contracts under the Personal Services Contracting Pilot Program.	Cherylynn Peters	3/12/2015	The Office of Contracts has developed and gave a training course on how to award and administer Personal Service Contracts.

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
5	Develop and implement policies and procedures to ensure that funds are available at the beginning of the period of performance for each contract, or a "subject to availability of funds clause" is included in the contract in event of a CR.	April Cabral/Cherylynn Peters/Connie Stephens	12/31/2015	The new procurement policy officer will be tasked with completing this policy.
6	Develop and implement fund control regulations, obtain approval from OMB and post on BBG website.	(Andre Mendes)/April Cabral/ Connie Stephens	6/30/2015	The Policy Officer is working on a revised policy in coordination with the CFO Office.
7	Develop policies, procedures, and implementation guidance for conducting acquisition planning in accordance with the FAR.	April Cabral/Cherylynn Peters	12/31/2015	The new procurement policy officer will be tasked with completing this policy.
8	Develop policies, procedures, and implementation guidance for conducting market research in accordance with the FAR.	April Cabral/Cherylynn Peters	2/11/15 and 12/31/2015	The Office of Contracts issued a Directive/Action Memo on market research which was disseminated to Contracting Officers. The new procurement policy officer will be tasked with completing this policy.
9	The Office of Contracts issued a Directive/Action Memo on market research which was disseminated to Contracting Officers. The new procurement policy officer will be tasked with completing this policy.	Cherylynn Peters	Completed	Completed

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
10	Develop policies, procedures, and implementation guidance to ensure compliance with the Competition in Contracting Act and the FAR regarding publication of contract actions.	Cherylynn Peters/ April Cabral	4/30/2015 and 12/31/15	Directives/Action Memos were issued by Contracts. The new procurement policy officer will be tasked with completing these policies.
11	Develop policies, procedures, and implementation guidance to ensure all offers are evaluated for each	Cherylynn Peters	4/30/2015 and 12/31/15	A Directive/Action Memo was issued by Contracts. The new procurement policy officer will be tasked with completing this policy.
12	Develop policies, procedures, and implementation guidance to ensure that justifications for other than full and open competition are adequately documented and used in accordance with the FAR.	April Cabral/Cherylynn Peters	12/31/2015	The new procurement policy officer will be tasked with completing these policies.
13	Dir. Global Ops to advise all IBB offices re roles of CON and SPE, and requirement to comply with CICA and FAR.	André Mendes	Completed	Completed
14	Comprehensive training to all acquisition team re CICA and FAR.	Cherylynn Peters	4/30/2015	Completed. All involved in acquisition process received training on Competition in Contracting Act, FAR competition regulations and implications of noncompliance. Additionally, a Directive/Action Memo has been issued by Contracts.

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
15	Develop policies, procedures, and implementation guidance that directs contracting officers how to determine and document whether contract prices are fair and reasonable.	Cherylynn Peters/ April Cabral	1/31/2015 and 12/31/15	A Directive/Action Memo has been issued by Contracts. The new procurement policy officer will be tasked with completing these policies.
16	Training re how to conduct and document contract price determinations.	Cherylynn Peters	4/30/2015	Completed. COs received training to conduct and document contract price determinations. Additionally, a Directive/Action Memo has been issued by Contracts.
17	CON review each of the contracts in Table 1 Appendix A of the audit report to determine whether the contract price was fair and reasonable IAW FAR.	Cherylynn Peters	Completed	Completed
18	Develop policies, procedures and implementation guidance to contracting officers on the type and extent of contractor responsibility determinations to be made for each award.	Cherylynn Peters/ April Cabral	1/31/2015 and 12/31/15	A Directive/Action Memo has been issued by Contracts. The new procurement policy officer will be tasked with completing this policy.
19	Update policies and procedures for contractor requirements for the DUNS and registration within CCR to ensure procedures are in accordance with the FAR.	Cherylynn Peters	1/31/2015 and 12/31/15	A Directive/Action Memo has been issued by the Office of Contracts. The new procurement policy officer will be tasked with completing this policy.

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
20	Train Contracting Officers to conduct and document responsibility determinations and to limit only exemptions to those permitted by FAR or OFPP guidance.	Cherylynn Peters	4/30/2015	Completed. Contractor Officers received training to conduct and document responsibility determinations.
21	Develop policies/procedures/guidance ensuring a COR for every contract, COR appointment letters define role and responsibilities, and are filed in contract files.	April Cabral/Cherylynn Peters	Completed	Completed
22	Develop policies, procedures, and implementation guidance to ensure that Contracting Officers and CORs understand quality assurance procedures that should be performed in accordance with the FAR.	April Cabral/Cherylynn Peters	12/31/2015	The new procurement policy officer will be tasked with completing these policies.
23	CON review Contract No. BBG50-P-11-0009, determine whether the contractor was paid \$8,250 for unperformed work, and if so seek reimbursement.	Cherylynn Peters	Completed	Completed
24	Develop policies, procedures, and implementation guidance to ensure that contractors are not performing inherently governmental functions.	April Cabral/Cherylynn Peters	Completed 7/10/2014	A finalized copy of the Inherently Governmental policy has been implemented.

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
25	Develop policies, procedures, and implementation guidance for validating and documenting contractor expenses before expending funds.	Cherylynn Peters/ April Cabral	4/30/2015 and 12/31/15	A Directive/Action Memo was issued by Contracts. The new procurement policy officer will be tasked with completing this policy.
26	CON review Contract No. BBG50-P-13-0600; determine whether \$16,075 in unsupported costs were allowable; and if not, recover them.	Cherylynn Peters	Completed	Completed
27	Develop policies, procedures, and implementation guidance directing program officials regarding the use and extent of performance evaluations.	April Cabral	5/30/2015	The Agency's draft policy is with the Office of General Counsel for review.
28	Develop policies, procedures, and implementation guidance related to use of past performance information in contract evaluations.	April Cabral	5/30/2015	The Agency's draft policy is with the Office of General Counsel for review.
29	Develop and implement a system to track contracting officer's training, missing training, and resulting expired warrants.	Cherylynn Peters	Completed 1/31/2015	Completed. The Office of Contracts has established a BBG tracking system for Contracting Officers' training.
30	Develop policies and procedures to ensure that contracting officers obtain and maintain training requirements for compliance with FAC-CO program.	April Cabral/Cherylynn Peters	Completed 1/31/2015	The Contracting Officers Warrant System Policy (COWS) has been finalized and is with management for signature and implementation.

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
31	Develop policies, procedures, and a comprehensive training program for CORs.	April Cabral/Cherylynn Peters	Completed	Completed
32	Develop and implement a tracking system for COR training, so pertinent parties can be informed of missing training and resulting expired certifications.	Cherylynn Peters	Completed	Completed
33	Develop policies, procedures, and implementation guidance that mandates the documentation required in the contract file for different types of contracts.	Cherylynn Peters/ April Cabral	1/31/2015 and 12/31/15	A Directive/Action Memo was issued by Contracts. The new procurement policy officer will be tasked with completing this policy.
34	Develop policies and procedures to periodically perform quality control reviews of contract files.	April Cabral/Cherylynn Peters	4/30/15 and 9/30/2015	A Directive/Action Memo was issued by Contracts. A current BAM policy will be updated by the agency's Policy Officer.
35	Update training curriculum to ensure that COs et al are trained periodically trained on official contract file content requirements.	Cherylynn Peters	4/30/2015	COs training on required contents for the official contract file is complete. Additionally, the Office of Contracts has issued a Directive/Action Memo to Office of Contracts staff.
36	If possible, ratify BBG28-F-11-0031 and BBG50-J-12-0709.	Cherylynn Peters	Completed 1/31/2015	Completed. The ratifications for Contracts BBG28-F-11-0031 and BBG50-J-12-0709 were ratified on 1/13/15.
37	Develop policies, procedures and appropriate internal controls to ensure that COs do not sign above	Cherylynn Peters	Completed	Completed

OIG Rec No.	Action Item	Responsible Manager	Target Completion Date	Action Status
	their warrant levels.			
38	Develop and implement an updated reporting structure for contracting officers that are embedded in program offices to ensure proper oversight by the Office of Contracts.	Andre Mendes	5/18/2015	VOA Contracting Officer functions will be transferred to the Office of Contracts.

APPENDIX C: BBG RESPONSE TO 2015 OIG MANAGEMENT ALERT



**BROADCASTING BOARD OF GOVERNORS
UNITED STATES OF AMERICA**

May 11, 2015

Mr. Steve A. Linick
Inspector General
Office of Inspector General
U.S. Department of State

Dear Mr. Linick:

The Broadcasting Board of Governors (BBG) is pleased to provide comments on the draft “*Management Alert: Broadcasting Board of Governors Significant Management Weaknesses.*” The Office of Inspector General’s recommendations have proven to be a valuable guide in improving Agency operations, and BBG has worked diligently over the past three years to address the concerns previously raised in the reports referenced in the Management Alert (“the Alert”). In particular, we note that all but two of the 164 recommendations in this Alert have been closed or resolved by BBG, and we are working aggressively to close all of the recommendations.

While BBG remains committed to working closely with OIG on continuous agency improvements, we feel strongly that this draft Alert should be revised to more accurately characterize BBG’s comprehensive implementation to date of the recommendations made by your Office. As currently written, the Alert recaps OIG findings as originally issued – some more than three years ago – without a status update reflecting BBG’s success in having already implemented the recommendations. It is only by closely examining the status of each recommendation in the appendices to the Alert that the reader might become aware of the substantial work completed by the Agency. Therefore, we believe it is important for accuracy that this Alert capture the current status of these issues and reflect Agency operations as they stand today, rather than simply at the time of the various audits and inspections.

We would like to highlight some of the areas where we believe the text is highly misleading:

Leadership: The Current BBG Board is Committed, Constructive and Actively Involved in the Strategy and Governance of the Agency

The Alert’s finding of “Ineffective Leadership” is based on an inspection of the prior Board of Governors, which served from July 2010 to August 2013. After a new BBG Chairman and two other Governors were sworn-in office in August 2013, only two Governors from that previous

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Board remained. The Alert reiterates a number of issues that applied to the Board of Governors during the 2010 to 2013 period. However, as a contemporary document, we believe the Alert should acknowledge the actions of the current Board – now in office for more than a year and a half – which has worked closely with the OIG. Indeed, as a result of the new Board’s actions, all of the recommendations issued by OIG in that inspection are now considered to be “closed” by OIG.

For example, the Alert cites chronic vacancies and absences of Board members in late 2012 as threatening the Board’s quorum and limiting the diversity of perspectives brought to discussion. These are issues that no longer affect the Board. While the Agency still has limited ability to influence the timing of Presidential nominations and Senate confirmations for Board vacancies, because of the *effective* leadership of the current BBG Chairman and the Governors who currently serve on the Board, Board and committee meetings are consistently well attended, collegial and constructive.

Similarly, the Alert reiterates OIG’s recommendation in January 2013 that BBG create a Chief Executive Officer (CEO) position, but does not mention the concrete steps taken by the current Board of Governors to create and fill this position. The BBG endorsed this recommendation and worked with the Administration to propose legislation to the Congress in Fiscal Years 2014 and 2015 to establish the position of CEO in the Agency’s statute. Although the legislation is still pending in Congress, the Board of Governors created the position of CEO within the limits of its authorities, adopting formal delegations of authority, effectively creating an “office” of the Chief Executive Officer. Through a competitive process, the Board identified an excellent candidate and worked closely with the Office of Personnel Management and the White House to hire him as a non-career Senior Executive Service member. As the Alert notes, the current BBG Chairman swore in the new CEO of BBG in January 2015. While that CEO only occupied the position for a short time, leaving the Agency to rejoin his former employer (a major U.S. broadcast news network), the Agency quickly appointed a highly qualified acting CEO to oversee and direct the day-to-day management of the Broadcasting Board of Governors. Mr. André Mendes, a seasoned BBG executive with an extensive track record of achieving operational excellence at the BBG and other organizations, currently serves as the Interim CEO. The Board formally delegated all of the authorities associated with the position to Mr. Mendes. As the Board works to identify a permanent CEO, its Interim CEO is fully empowered to act as the day-to-day executive called for in the January 2013 inspection report.

OIG also found that a part-time Board of Governors could not provide effective oversight to all U.S. international media, and that the Board’s By-Laws and self-adopted governance policies were inadequate to appropriately govern the conduct of Board business. It should be clarified that the part-time status and oversight structure of the Board is governed by federal statute and in fact, the Board today acts as a highly functioning body with active governance oversight.

Oversight of Grants and Contracts: The Current BBG Board is Actively Involved in the Governance of Its Grantees

In the past, OIG reports have criticized BBG for not having sufficient oversight of its grantees. Notwithstanding the differing opinions in the federal government, in the Congress, and between the Agency and its grantees on interpreting the legal authorities governing such oversight, the

current Board is now actively involved in oversight and governance with its grantees. The Agency is also sensitive to concerns regarding the need for in-depth financial oversight of grantee expenditures. The Agency will soon have a Grants Manager in place to enhance Agency oversight. In addition, we are examining recommendations made by KPMG regarding appropriate oversight.

Contracting and Financial Management: The Current BBG Has Improved the Function and Financial Management of the BBG

After a comprehensive review, BBG has updated policies and procedures in the areas of contracting and financial management. Per the OIG's 2013 recommendations, the BBG has significantly enhanced compliance with the Federal Acquisition Regulation and in financial monitoring of the contracting function. In a major step toward OIG compliance, the Agency began a transition from obtaining services that it had for more than 60 years acquired from Purchase Order Vendors (POVs), to obtaining these services from vendors who specialize in providing and managing staff. In an expeditious process, the Agency has transitioned 103 POVs of the Voice of America under this program and is substantially ahead of its target schedule for completion of this massive resource migration.

Information Security: The Agency Continues Its Leadership Role in Anti-Censorship and Is Addressing the Challenges of Information Security

The Agency has invested resources towards mitigating the weaknesses identified in the OIG's FY 2014 annual audit on compliance with the Federal Information Security Management Act (FISMA), and continues to work aggressively to address the goals outlined by the Act. An information system compliance program was developed to assess the security posture of all Agency information systems; and to identify weaknesses that need mitigation through documented plans and milestones. In parallel with these compliance efforts, the Agency continues to engage system users about information security threats, particularly those found on the Internet and in email.

Conclusion: We Ask that the Management Alert Better Reflect the Many Changes that Have Taken Place at the BBG over the Past Three Fiscal Years

In closing, the new leadership at the helm has dramatically improved the function of the BBG, and we ask that the Alert more accurately reflect the significant changes that have taken place. We believe in accountability, and have made rapid, visible efforts to address past challenges.

Notably, in close collaboration with the National Security Council, Department of State and Congress, the BBG has been a leader in responding to Russian propaganda, doubling its audience in Ukraine and leading other international and local broadcasters in establishing a strong local media focused on countering the Russian disinformation campaign. BBG's coverage of the changing U.S. relationship with Cuba, the democracy protest in Hong Kong, and Boko Haram and ISIL atrocities evince an agile, global multi-media network. BBG and its grantees are also the global leaders in the Internet anti-censorship arena, while also being a leader in the Federal Government in the leveraging of server virtualization and cloud-based computing. Under the

leadership of the current Board, BBG weekly audiences worldwide have reached an all-time high of 220 million people.

Please know the BBG takes all OIG reports seriously, as evidenced by our considerable and substantive efforts over the past three years to address all of the recommendations highlighted in the Alert. We also sincerely appreciate our partnership with OIG in making sure that the BBG works to constantly make improvements to the Agency. In fact, the original 2013 inspection report on the Board was welcomed as a guideline for action and was instrumental in pushing forward many positive changes that have recently occurred, enhancing our ability to quickly respond to changing geopolitical events and national security priorities.

We sincerely thank you for your continued evaluation of the BBG. We are sure you will agree that it is important that the readers of the Management Alert come away with an accurate understanding of the current state of the BBG rather than a reprise of the past. With your guidance and appropriate oversight, we can enhance and accelerate our critical work on behalf of the people of the United States.

As always, thank you for your partnership, guidance and support.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey Shell', written in a cursive style.

Jeffrey Shell
Chairman

ABBREVIATIONS

ADA	Anti-Deficiency Act
BBG	Broadcasting Board of Governors
CEO	Chief Executive Officer
FAR	Federal Acquisition Regulation
FISMA	Federal Information Security Management Act
GAO	U.S. Government Accountability Office
MBN	Middle East Broadcasting Networks
OCB	Office of Cuba Broadcasting
OMB	Office of Management and Budget
OIG	Office of Inspector General
RFA	Radio Free Asia
RFE/RL	Radio Free Europe/Radio Liberty



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